

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GABRIELLE HOFFMAN, individually and  
Derivatively on behalf of G-LISH FASHIONS, INC.,

Docket No.: 20-08839-LAK, 21-cv-  
00052-LAK

*Plaintiffs,*

vs.

BRETT RATTNER,

*Defendant.*

Hon. Lewis A. Kaplan, D.J.

**DECLARATION OF JEB  
SINGER, ESQ. IN SUPPORT  
OF MOTION TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS**

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Pursuant to 28 U.S.C. § 1746, JEB SINGER, ESQ. declares under penalty of perjury that the following is true and correct:

1. I am the managing attorney of J. Singer Law Group, PLLC, currently attorneys for plaintiff Gabrielle Hoffman (“Client”) in this action. I submit this Declaration in support of this Firm’s Motion pursuant to, inter alia, Local Rule 1.4 and N.Y. Rules of Professional Conduct 1.16(c)(4) and (c)(7) to be Relieved as Counsel to Plaintiffs.
2. On or about January 30, 2021, Defendant Brett Rattner filed a Motion for Attorney Fees based on Your Honor’s decision, dated January 10, 2021.
3. That Decision relates to the Defendant’s Second Motion to Cancel Plaintiff’s Notice of Pendency and the award of costs and expenses related thereto.
4. As the Court is aware, Defendant’s Attorney’s Fees Motion requests to hold me as counsel jointly and severally liable for certain Attorney’s Fees.
5. Given this pending Motion there is a very real potential for a conflict of interest, and after consultation with my own personal counsel, it is now ethically incumbent upon me to cease my representation of Client.
6. For avoidance of doubt, I vehemently object to the Defendant’s Fee Motion and have

retained counsel to act on my behalf in addressed the same.

7. Nonetheless, both prior to this Decision and Motion and subsequently, my client and I have had irreconciled differences and disagreements as to how to handle this representation. *See* N.Y. Rule of Professional Conduct 1.16(c)(4). In addition, Client has made the representation unreasonably difficult for this Firm to carry out. *See* N.Y. Rule of Professional Conduct 1.16(c)(7).

8. Further, Client has taken certain actions that are directly contrary to her best interests and have made it difficult to effectively represent her.

9. Given my Withdrawal Motion, I hereby request that this case be stayed for a reasonable amount of time, but not less than sixty (60) days, for my Client to locate and engage counsel to act on her behalf.

10. My withdrawal will not prejudice my Client. To the contrary, it is important that my Client protect herself and her position by having new counsel without any conflicts.

11. For avoidance of doubt, nothing herein is intended to serve as a waiver of any legal right and all rights are expressly reserved.

12. For the reasons stated herein, Counsel requests that this Court issue an Order 1) permitting this Firm to withdraw as Counsel for Plaintiffs, 2) stay this matter for a reasonable amount of time but not less than sixty (60) days to permit Plaintiffs to obtain substitute counsel, 3) granting such other and further relief as the Court deems just and proper.

Dated: February 12, 2021  
New York, NY

By: /s/ Jeb Singer

CC: All Counsel (by ECF) and Gabrielle Hoffman (by email)